



Decision _____

FILED08/24/21
04:59 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

A2108016

Application of the Mussey Grade Road Alliance for award of intervenor compensation for substantial contributions to Resolutions WSD-019	A.21-08-XXX August 24, 2021
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**INTERVENOR COMPENSATION CLAIM OF MUSSEY GRADE ROAD
ALLIANCE AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
MUSSEY GRADE ROAD ALLIANCE**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at icompcordinator@cpuc.ca.gov.

Intervenor: Mussey Grade Road Alliance	For contribution to Resolution WSD-019
Claimed: \$27,884	Awarded: \$
Assigned Commissioner: TBD	Assigned ALJ: TBD
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Diane J. Conklin
Date: 8/24/2021	Printed Name: Diane J. Conklin

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	RESOLUTION WSD-019 Resolution Ratifying Action of the Wildfire Safety Division on San Diego Gas & Electric's 2021 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	N/A	
2. Other specified date for NOI:	9/20/2021 (60 days after issuance)	
3. Date NOI filed:	8/24/2021	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.20-07-013	
6. Date of ALJ ruling:	12/16/2020	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-07-013	
10. Date of ALJ ruling:	12/16/2020	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	WSD-019	
14. Date of issuance of Final Order or Decision:	7/20/2021	
15. File date of compensation request:	8/24/2021	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

#	Intervenor's Comment(s)	CPUC Discussion
1	<p>Unlike previous Wildfire Mitigation Plan (WMP) reviews, the Wildfire Safety Division (WSD)/Office of Energy Infrastructure Safety (OEIS) has issued its proposed resolutions for the three major utilities in series rather than in parallel. The spacing of the resolutions is that it is untenable for MGRA to issue one intervenor compensation claim covering all utilities as it has in the past and comply with the 60-day statutory deadline. Hence, the claims for SDG&E, SCE, and PG&E are being issued separately.</p> <p>Part of MGRA's plea in this application is to have its 2021 WMP intervenor compensation claim applications consolidated into one proceeding. Many of the documents used in these applications are duplicative, and timesheets should be compared for completeness and accuracy. Furthermore, MGRA necessarily divided work by utility as well as task, and so the balancing of assessed cost by IOU revenue was not done as was in previous IC applications.</p> <p>The present application covers contributions to SDG&E's 2021 WMP review.</p>	
2	<p>When keeping track of hourly work performed, MGRA had no prior knowledge that this work should be tracked on a per-utility basis, since in previous years tracking work across all utilities was sufficient. Extra effort had to therefore be expended to divide up contributions by utilities based on content. In the case that work done by MGRA applied to all utilities, hours were divided up equally between them. An extra worksheet is attached describing how MGRA work products have been divided up by both tasks and utilities. Furthermore, columns have been added to the timesheets to show relative contributions of each task on a per-utility basis. This will allow similar timesheets to be submitted for all three compensation claims.</p>	
3	<p>After the approval of the 2020 WMPs, utilities were required to issue quarterly updates and data reports. MGRA served comments on these reports, some of which contributed to WSD's finding on these reports</p>	

	and thereby to the 2021 WMP Updates. MGRA work on these updates was performed subsequent to work previously performed that resulted in its compensation award under. D.21-05-011. Under Rule 17.4(d) of the Rules of Practice and Procedure, work performed prior to the start of a proceeding may be compensable. Time spent in review and comment on utility reports prior to WMP submission is therefore included in the timesheets.	
4	Regarding quarterly reports, there are some internal inconsistencies with MGRA’s naming of these reports. This arose from 1) utilities not always using identical naming conventions for their reports 2) MGRA often used the quarter in which the report was sent rather than the quarter the report evaluated for the name or title of its comments. File names have been updated with an additional attachment identifier to ensure consistency and traceability. A list of all attachments is available in Table III.C.	

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
1. Note: For definition of contribution types, see Comment 1 in Section C. For definition of issue, see Comment 2 in Section C. For reference abbreviations, see Comment 3 in Section C		
2. MGRA analyzed SDG&E’s vegetation outage data and found that the genus outage frequency differed from the at-	WSD-019-AS; p. 18 - “SDG&E needs to provide more granularity to its analysis of hazard trees... analyzing outage risk per species (MGRA).”	

<p>risk ranking used by SDG&E. In particular, MGRA found that outage rates from oaks were significantly lower from those of palms, cypress, and eucalyptus.</p> <p>Type: Primary Issue: VM</p>	<p>WSD-019-App-1- Issue SDGE-21-06 – “Mussey Grade Road Alliance (MGRA) analyzed SDG&E’s vegetation-caused outage data to determine the outages per 1000 trees per year by tree genus. MGRA found that palm, cypress, and century plant constituted the highest risk with >1 outage per 1000 trees per year. These data are inconsistent with SDG&E’s statement that it “targeted species... SDG&E must use quantitative data to inform its “at-risk” species targeting; purely qualitative evaluation of a tree’s risk does not adequately address the quantitative risk of ignition or outage.”</p>	
<p>3. MGRA attempted to compare the risk/spend efficiencies across utilities and demonstrated that the utility approaches were so incompatible that this was not feasible. MGRA was the only intervenor to attempt this cross-utility comparison.</p> <p>Type: Initiator Issue: RSE</p>	<p>WSD-019-AS; p. 17 – “The WSD has evaluated comments and concurs with the following stakeholder input on SDG&E’s 2021 WMP Update, as reflected in this Action Statement:</p> <ul style="list-style-type: none"> • There should be a coordinated approach to the calculation of risk-spend efficiency values across the utilities (MGRA, TURN, Cal Advocates).” <p>WSD-019-App-1 Issue-SDG&E-21-11 - “The WSD is concerned by the stark variances in RSE estimates, sometimes on several orders of magnitude, for the same initiatives calculated by different utilities.”</p> <p>MGRA-WMP-Cmt; p. 66 – The table above would seem to suggest that the three major California IOUs are operating on different planets. The lack of comparability between the three utilities fundamentally calls into question the implementation of the current risk-based decision making framework.”</p>	
<p>4. MGRA suggested that OEIS create a working group to study covered conductor because SCE has developed an</p>	<p>WSD-019-AS p. 17 – “In particular there should be a coordinated approach to looking at the costs and risk-spend efficiency of covered conductor</p>	

<p>aggressive and purportedly low-cost program for covered conductor deployment.</p> <p>Type: Contributor</p> <p>Issue: Hdn</p>	<p>installation across the utilities (MGRA, TURN, Cal Advocates).”</p> <p>WSD-019-App-1 Issue-SDG&E-21-03 – “The utilities must coordinate to develop a consistent approach to evaluating the long-term risk reduction and cost-effectiveness of covered conductor deployment...”</p> <p>MGRA-WMP-Cmt; p. 65 – “The WSD should gather additional information regarding utility covered conductor programs to try to determine actual risk/spend efficiencies relative to other mitigation measures, and should ascertain whether IOUs are correctly assessing the costs and benefits of covered conductor.”</p> <p>MGRA-QR-20Q2 – “WSD should encourage the IOUs to collaborate on an experimental program to measure the resistance of covered conductor to severe vegetation contact or line breakage events, estimating the probability of arcing and magnitude of energy release compared to bare conductor under similar circumstances. The IOUs should also come up with a common method of measuring the risk reduction provided by covered conductor for various types of outages, faults, or infrastructure damage.”</p>	
<p>5. MGRA raised concerns regarding the consequence model based on Technosylva fire spread modeling because of the early (8 hour) termination of fire spread.</p> <p>Type: Contributor</p> <p>Issue: RM</p>	<p>WSD-019-AS p. 18 – “There should also be a coordinated approach to the utilities’ risk modeling efforts, supported by a WSD-led technical working group (Cal Advocates). The risk models should be subject to verification (MGRA).</p> <p>WSD-019-App-1 Issue-SDG&E-21-02 “The utilities must collaborate through a working group facilitated by Energy Safety to develop a more consistent</p>	

	<p>statewide approach to wildfire risk modeling.”</p> <p>MGRA-WMP-Cmt; p. 54 – “The Wildfire Safety Division should sponsor workshops and/or working groups to analyze assumptions regarding Technosylva model inputs in order to ensure that simulations are equivalent to power line fire events.”</p>	
<p>6. MGRA urged that OEIS ensure that utilities are prioritizing ignitions that are the most likely under extreme fire conditions.</p> <p>Type: Primary</p> <p>Issue: IgW</p>	<p>WSD-019-AS p. 18 – “The utilities should prioritize wildfire mitigation measures that address ignitions that have external drivers (like high wind) and are likely to occur under the worst possible conditions (i.e., likely to lead to catastrophic fires) (MGRA).”</p> <p>WSD-019-App-1 Issue-SDG&E-21-01 – “SDG&E must fully explain... How SDG&E targets its mitigations efforts to reduce ignitions that are more likely to result in catastrophic wildfire conditions.”</p> <p>MGRA-WMP-Cmt; p. 34 – “So, in prioritizing mitigation work, utilities should be prioritizing the prevention of catastrophic fires, rather than trying to prevent the greatest number of ignitions. The goal of a data science approach to this problem should be to identify which if any environmental and physical characteristics are the best predictors of catastrophic wildfires.”</p>	
<p>7. MGRA warned against placing undue emphasis on third-party ignitions which do not correlate with extreme weather events, such as balloons and traffic collisions.</p> <p>Type: Primary</p> <p>Issue: IgW</p>	<p>WSD-019-App-1 Issue-SDG&E-21-01 – “SDG&E identifies vehicle contact and balloon contact as the first and second highest ignition risks but does not explain how that affects its risk models or mitigation selection”</p> <p>MGRA-WMP-Rep; p. 12 – “In MGRA’s comments on the WSD-002 through WSD-005, MGRA urged WSD and the Commission not to over-emphasize ignitions from external agents that are uncorrelated with fire</p>	

	weather, such as balloons, animals, and vehicles...”	
<p>8. MGRA requested spreadsheets for the IOU’s Maturity Survey (UWMMA) so that it could compare utility progress. OEIS cites to MGRA’s request.</p> <p>Type: Complimentary</p> <p>Issue: Gen</p>	<p>WSD-019-AS p. 16 – “See the utility’s explanation of its 2021 changes in maturity on the Maturity Survey in its response to a data request from MGRA submitted by the utility on March 17, 2021, “MGRA DR 5 - SDGE UWMMA Survey 2021” (accessed April 29, 2021)”</p> <p>MGRA-WMP-Cmt; p. 83 – “Table 17 - Summary of the SDG&E, PG&E, and SCE Utility Wildfire Mitigation Maturity Survey for 2021 and comparison with 2020. This table provides a count of the capabilities that have been upgraded and downgraded according to the utility self-assessments. Upgrades and downgrades for future capabilities (2022) are also provided.”</p>	
<p>9. MGRA were organizers and co-authors of the Joint Stakeholder Request for Extension of Time to Provide 2021 Wildfire Mitigation Plan Comments. This request was granted by WSD.</p> <p>Type: Initiator</p> <p>Issue: Gen</p>	<p>WSD-Ext-Resp – “Stakeholders may now submit comments on the Large IOUs’ 2021 WMPs by Monday, March 29, 2021, and submit reply comments by Tuesday, April 6, 2021.”</p> <p>JS-Ext-Req – “The Joint Stakeholders submit that a deadline extension of eight business days will result in significantly more thorough and accurate public comments, which will assist your division in making informed decisions to approve or deny the 2021 WMPs.”</p>	
<p>10. MGRA found that SDG&E’s covered conductor pilot program was insufficient in scope or methodology to provide useable feedback as to the efficacy of the program.</p> <p>Type: Initiator</p> <p>Issue: AT</p>	<p>WSD-019-AS; p. 43 – “SDG&E also considers a single year for 1.9 miles of covered conductor a “successful pilot,” even though the sample size is small and a year of data does not seem sufficient to demonstrate the effectiveness of covered conductor... SDG&E’s current covered conductor pilot efforts are limited in scope, and the utility provides little data about the pilot’s size and duration.”</p>	

	<p>MGRA-QR-20Q3; pp. 2-3 - “SDG&E (in particular) and SCE’s submissions share a similar weakness, namely that proposals for expanded use of a technology are gated by potentially long evaluation times as the pilot projects acquire data regarding rare events.... As the deployed segment is only 1.9 miles long, it could take many years for sufficient reliability data to be accumulated.”</p>	
<p>11. MGRA noted that SDG&E’s description of its pilot programs was inadequate to judge their progress or efficacy.</p> <p>Type: Initiator</p> <p>Issue: AT</p>	<p>WSD-019-AS; p. 38 – “SDG&E provides limited discussion within this section of the status of various pilot programs related to situational awareness. Section 7.3.3.9 of SDG&E’s 2021 WMP Update briefly mentions pilots of Early Fault Detection (EFD) and Wire Down Detection (WDD),⁸⁷ but SDG&E provides neither the status nor scope of these pilots.”</p> <p>MGRA-QR-20Q3; p. 3 - As for the Falling Conductor Program, SDG&E’s submission does not state how many circuit miles are covered by protection devices running in “test mode”, so it is likewise not possible to state how long that SDG&E needs to accumulate additional data to validate the pilot project.”</p>	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN, GPI, PCF, SBUA		

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>d. Intervenor's claim of non-duplication:</p> <p>MGRA, due to its emphasis on safety and its strong technical background, was able to take a number of unique positions in its interventions. MGRA was involved in the 2019 and 2020 WMPs as well as the original development of utility Fire Protection Plans and brings with it directional vision for utility fire safety.</p> <p>While other intervenors' positions are similar to MGRA's in some cases, there are notable differences. TURN's primary goal has been ratepayer protection. GPI is concerned with renewable energy. These lead to a difference in emphasis between MGRA's positions and those of the others.</p> <p>Additionally, MGRA contributions tend to be based on collection and analysis of utility data, which makes its contributions distinctive among intervenors. Because MGRA's contributions were primarily technical, we did not anticipate that our technical contributions would substantially overlap with those of other intervenors, and to a great extent overlap was minimal. Where there was overlap (for instance with regard to covered conductor), MGRA brought up unique technical points.</p> <p>MGRA also coordinated with other stakeholders, for instance initiating the request for deadline change, later granted by WSD.</p>	

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment			CPUC Discussion
1	Contribution Types	There are various types and levels of contribution that the Alliance interventions provided. These are defined and explained below.		
	Primary	A Primary contribution is one in which the Alliance made a unique and definitive difference in supplying information not supplied by any other party. The Alliance can show that "but for" its intervention, the Decision would have likely reached a different conclusion.		
	Initiator	In instances where the Alliance was an "Initiator", it was the first to bring a particular issue or analysis to the Commission's attention. Other parties subsequently made additions or improvements that were accepted by the Commission.		
	Contributor	While not initiating an analysis or study, the Alliance made a significant contribution to it. Also, in decisions or conclusions which take into account many different factors,		

		the Alliance's results contribute one or more of these factors.		
	Improvement	The Alliance commented on an existing process or measure and its suggestion was adopted in the final decision.		
	Complimentary	The Alliance chose a different method or analysis than that used in the Final Decision, but which is consistent with it and supports the same results.		
	Alternative	The Alliance reached a conclusion or presented an analysis at variance with the Decision but which raised important points.		
2	Abbreviations for issues that MGRA was involved in: Gen: General Procedural issues, preambles, establishing record, scope, process, general document review RM: Risk Modeling Issues relating to fire spread and consequence modeling. VM: Vegetation Management Issues relating to vegetation management. IgW: Ignition and Wind Issues related to wind speeds, calculated and measured, and to ignition probability. Hdn: Hardening Issues related to covered conductor, undergrounding, and other hardening mitigations. RSE: Risk Spend Efficiency Issues related to risk estimation, risk/spend efficiency, MAVF usage. Also includes power shutoff (PSPS). PS: Power Shutoff Issues related to PSPS and mitigations to reduce PSPS AT: Advanced Technologies Issues related to advanced mitigation technologies and utility pilot programs.			
3	Abbreviations for documents WSD-019 Final Resolution WSD-019-AS Final Resolution / Action Statement WSD-019-P Proposed Resolution MGRA-WMP-Rev Comments on WMP revisions MGRA-WMP-Rep Reply to party comments on WMPs MGRA-QR-21Q1 Comments on 2021 Q1 quarterly reports (May 21) MGRA-QR-20Q4 Comments on 2020 Q4 quarterly reports (Mar 21) MGRA-WMP-Cmt Comments on 2021 WMPs WSD-Ext-Resp WSD Response to Stakeholder Extension Request JS-Ext-Req Joint Stakeholder extension request MGRA-QR-20Q3 Comments on 2020 Q3 quarterly reports (Jan 21) MGRA-QR-20Q2 Comments on 2020 Q2 quarterly reports (Sep 20)			

	MGRA-QR-RCP	Comments on RCPs	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness:</p> <p>Over recent years, utility-caused wildfires have resulted in the deaths of over 130 people and damages over \$20 billion. The primary goal of the Mussey Grade Road Alliance in its interventions since 2007 has been to identify utility wildfire risks and to identify strategies to prevent them. In the context of wildfire risk, any strategy that reduces risk and does so at a reasonable cost provides a tremendous benefit to ratepayers. MGRA's expert, Joseph W. Mitchell, has been providing technical analysis of utility data and has published academic works on this subject, and has made numerous contributions to fire safety that have been recognized by the Commission. MGRA contributions were limited to areas in which we could provide unique, quantitative contributions.</p> <p>With the adoption of ALJ-393, a new compensation scale must be set for Dr. Mitchell that ensures that he is paid market rate for his contributions. To support his claim, Dr. Mitchell's Vitae is attached to this document. We request that Dr. Mitchell be classified as a physicist, which is his training and original career, and has been critical to his contributions, that he be granted 30 years of professional work experience, and that his compensation rate be raised to \$380 per hour from its current \$315 per hour. This rate reflects his 30 years of physics work experience and places him centrally between the median and high range of the Level V Physicist salary scale of the Hourly Rate chart. In order to support his classification and experience levels, an Experience Profile has been attached to this claim that compares Dr. Mitchell's experience against potential classification and roles and demonstrates that his skills and training as a physicist have been key to his unique contributions in his 14 years of work on Commission proceedings. A list of Dr. Mitchell's physics publications is attached to his CV.</p> <p>While it is hard to accurately quantify the extent to which MGRA's contribution will decrease future risk and costs, even an incremental contribution, when multiplied by the avoided losses, vastly exceeds the compensation being requested by the Alliance.</p>	
b. Reasonableness of hours claimed:	

<p>MGRA was careful to limit its participation to areas in which its expert could make a unique and substantive contribution, and to procedural areas of vital interest to the success of the proceeding.</p> <p>Dr. Mitchell has been intervening on fire safety issues before the Commission since 2007. Dr. Mitchell was the Alliance expert involved in the original Commission proceeding establishing Fire Protection Plans (which he proposed), R.08-10-005. In the intervening years, he has been involved in numerous efforts to improve wildfire safety, including active participation in the 2019 and 2020 WMP proceeds. Dr. Mitchell was therefore well-prepared for this proceeding and was able to efficiently identify and concentrate on key issues that needed attention.</p>	
<p>c. Allocation of hours by issue:</p> <p>Gen: 24.2 RM: 11.8 VM: 9.2 IgW: 8.2 Hdn: 1.7 RSE: 3.9 PS: 3.8 AT: 5.5</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Dr. Joseph Mitchell (Expert)	2020	8.6	315	D.21-05-011	\$2,701			
Dr. Joseph Mitchell (Expert)	2021	60.3	380	ALJ-393 Att. 4 – CV Att. 5 - Profile	\$22,901			
Subtotal: \$25,602						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$

Dr. Joseph Mitchell (Expert)	2021	12	190	ALJ-393 Att. 4 – CV Att. 5 - Profile	\$2,282			
Subtotal: \$2,282						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
Subtotal: \$						Subtotal: \$		
TOTAL REQUEST: \$27,884						TOTAL AWARD: \$		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
0	Attachment 0 - Application
1	Attachment 1 - Certificate of Service
2	Attachment 2 – Notice of Intent to Claim Intervenor Compensation

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

3	Attachment 3 - Dr. Joseph W. Mitchell timesheet
4	Attachment 4 - Dr. Joseph W. Mitchell Vitae
5	Attachment 5 - Dr. Joseph W. Mitchell Experience Profile
6	Attachment 6 – MGRA comments on WMP revisions
7	Attachment 7 – MGRA reply to party comments on WMPs
8	Attachment 8 – MGRA comments on 2021 Q1 quarterly reports (May 2021)
9	Attachment 9 - MGRA comments on 2020 Q4 quarterly reports (Mar 2021)
10	Attachment 10 – MGRA comments on 2021 WMPs
11	Attachment 11 – WSD response to stakeholder extension request
12	Attachment 12 – Joint Stakeholder extension request
13	Attachment 13 - MGRA comments on 2020 Q3 quarterly reports (Jan 2021)
14	Attachment 14 – MGRA comments on 2020 Q2 quarterly reports (Sep 2020)
15	Attachment 15 – MGRA comments on RCPs
16	Attachment 16 – Topics and IOU worksheet
Comment #1	<p>Comments re Mitchell timesheet, Attachment 3:</p> <p>As noted above, MGRA was not anticipating the need to divide work between IOUs. In order to remedy this, all work products were analyzed in order to gauge relative contributions. These are represented as weights for each utility, shown in Columns H:J on the timesheet.</p> <p>The division into topics is also finer grained than in previous requests, due to the large number of topics covered in the WMPs. Division by topic is also based on work product content. More details are provided in the topic worksheet, described in Comment #2. Work that was of general use to all utilities was divided equally among SDG&E, PG&E, and SCE.</p> <p>Where weights could not be correctly ascribed from the topic worksheet, the row is highlighted in tan. This is to indicate that in individual IOU filings, these particular rows will be manually updated to correctly assign weights.</p>
Comment #2	<p>Comments re topic worksheet, Attachment 16:</p> <p>This worksheet was used for determining the appropriate division of work between utilities and topics based on the final work product. For the case in which the work was of general use, time was divided evenly between SDG&E, PG&E, and SCE.</p> <p>Column A: Documents – Describes the work product.</p> <p>Column B: Topic – Abbreviation of topic. Also includes “SUM” rows that are used as consistency checks.</p> <p>Column C: Fraction – Fraction of the work product described by “Document” assigned to the “Topic”.</p> <p>Columns D-G: PerUtility – The overall fraction of work performed for a utility.</p>

	<p>Work of general use is described by the “All” column(G) and is divided equally among the three major IOUs.</p> <p>Columns H-J: PerUtilityPlusCommon – the PerUtility fraction plus contributions from the “All” column (G).</p> <p>Column K: Test – Consistency check</p> <p>Columns L-N: OverallFractionPerUtility – Fraction of work both by topic and utility (combines all utilities).</p> <p>Column O: Test – Consistency check</p> <p>Columns P-R: TopicPerUtility – Fraction of work by topic for each utility individually.</p>
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D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. [INTERVENOR'S FULL LEGAL NAME] [has/has not] made a substantial contribution to D. _____.
2. The requested hourly rates for [INTERVENOR'S FULL LEGAL NAME]'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ _____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. [INTERVENOR'S FULL LEGAL NAME] shall be awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay [INTERVENOR'S FULL LEGAL NAME] the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay [INTERVENOR'S FULL LEGAL NAME] their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of [INTERVENOR'S FULL LEGAL NAME]'s request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):			
Proceeding(s):			
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
[INTERVENOR'S NAME]				N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted

(END OF APPENDIX)